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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

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10 Yigremew Temesgen,

11 Plaintiffs,

12 v.

13 United States Citizenship and Immigration
Services; Merrick Garland, in his Official
Capacity Attorney General; United States
14 Department of State; Anthony Blinken, in
his Official Capacity, Secretary of State;
15 U.S. Consulate in Ethiopia; Chief,
Immigrant Visa Section, in Ethiopia; John
16 Doe, Consular Officer, Ethiopia,

17 Defendants.

18 Case No. 2:23-cv-02119-CDS-DJA

19 **Stipulation and Order to Extend Federal**
Defendants' Deadline to Answer or
otherwise Respond to Plaintiff's Complaint
for Writ of Mandamus and Complaint
Under Administrative Procedure Act (ECF
No. 1)

20 **(Second Request)**

21 Plaintiff, Yigremew Temesgen, through counsel and the United States of America,
on behalf of Federal Defendants, through counsel, hereby agree and stipulate to extend the
deadline to answer or otherwise respond to Plaintiff's Complaint for Writ of Mandamus
and Complaint Under Administrative Procedure Act by an additional 30 days, until **May**
22 31, 2024. The parties enter into this stipulate based on the following:

23 1. Plaintiff filed the Complaint on December 26, 2023 (ECF No. 1).

1 2. Plaintiff served the United States with a copy of the Summons and
2 Complaint on January 31, 2024.

3 3. The original deadline for Federal Defendants to answer or otherwise respond
4 was April 1, 2024.

5 4. The parties stipulated, and the Court granted a previous extension until May
6 1, 2024 (ECF Nos. 5–6) to respond to the complaint.

7 5. Since the filing and service of the Complaint, the parties have engaged in
8 actions that may resolve the issues in this case without the Court’s intervention. Those
9 actions include the agency’s issuance of a Notice of Intent to Revoke (“NOIR”) on
10 February 5, 2024, and Plaintiff responding to the NOIR. The agency has reviewed
11 Plaintiff’s response and issued a decision on the NOIR.

12 5. The requested 30-day extension will allow the parties additional time to
13 allow the agency and Plaintiff to continue to work towards a possible resolution on the
14 administrative side.

15 6. Should the parties be able to resolve the matter without further litigation, a
16 dismissal will follow. Should the parties be unable to resolve the matter without Court
17 interventions, Federal Defendants will move forward with responding to the Complaint on
18 or before May 31, 2024. Accordingly, the parties believe good cause exists for the extension
19 sought due to the interests of judicial economy and the parties’ resources.

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1 Therefore, Federal Defendants request that the Court extend the deadline for them
2 to answer or otherwise respond to **May 31, 2024**.

3 Respectfully submitted this 26th day of April 2024.

4 IMMIGRATION LEGAL
CONSULTING, LLC

JASON M. FRIERSON
United States Attorney

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6 /s/ Shaina Plaksin
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/s/ Skyler H. Pearson
SKYLER H. PEARSON
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8 *Attorney for Plaintiff*

Attorneys for the United States

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10 IT IS SO ORDERED
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13 UNITED STATES MAGISTRATE JUDGE

14 DATED: 4/29/2024

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